

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

BMG RIGHTS MANAGEMENT)
(US) LLC, and ROUND HILL)
MUSIC LP)

Plaintiffs,)

v.)

Case No. 1:14-cv-1611(LOG/JFA)

COX ENTERPRISES, INC.,)
COX COMMUNICATIONS, INC.,)
COXCOM, LLC)

Defendants.)

**PLAINTIFFS' MOTION TO FILE THEIR MOTION TO COMPEL DISCOVERY
RELATED TO DEFENDANTS' ADVICE OF COUNSEL DEFENSE AND RELATED
MATERIALS UNDER SEAL**

Plaintiffs BMG Rights Management (US) LLC and Round Hill Music LP ("Plaintiffs") hereby move for an order to seal *Plaintiffs' Memorandum In Support Of Their Motion to Compel Discovery Related to Defendants' Advice of Counsel Defense*. The Memorandum and its Exhibits should be filed under seal because they include confidential information that Defendants and Rightscorp have designated as subject to the Protective Order. Plaintiffs BMG Rights Management (US) LLC and Round Hill Music LP will file a public version of their Memorandum that redacts references to the materials designated as Highly Confidential.

Wherefore, Plaintiffs respectfully request that the Court grant their motion.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2015, I electronically filed a true and correct copy of the foregoing using the Court's CM/ECF system, which then sent a notification of such filing (NEF) to all counsel of record:

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